



Advocates for Safer Airports in Canada

August 8, 2025

Letter to the Transportation Safety Board of Canada

Yoan Marier
Chair, Transportation Safety Board of Canada
Place du Centre, 4th floor
200 Promenade du Portage
Gatineau QC K1A 1K8

VIA Email Yoan.Marier@bst-tsb.gc.ca

**Request for Broadened Scope of Deer Lake Crash Investigation – Airport
Emergency Preparedness and Response**

Dear Mr. Marier,

In light of the tragic crash of a Piper PA-31 Navajo aircraft near Deer Lake Regional Airport on July 26, 2025, I am writing on behalf of Advocates for Safer Airports in Canada (ASA Canada) to respectfully request that the Transportation Safety Board's investigation include a comprehensive review of the airport's emergency response capability—not solely the causal factors of the crash.

This must include a detailed analysis of:

- The incident command structure and scene management effectiveness;
- The staffing level of the airport's Aircraft Rescue and Firefighting (ARFF) team, and whether it met minimum international benchmarks (e.g., ICAO Annex 14, NFPA 403);
- The training and certification of ARFF personnel for aircraft-specific fire and rescue operations;
- The status and effectiveness of the mutual aid agreement with the Deer Lake municipal fire service;
- The continued use of PFOS-containing firefighting foam, despite PFOS being banned in Canada, and the lack of clarity around environmental remediation;
- And the airport authority's compliance with occupational health and safety legislation, both federally and provincially, in providing ARFF personnel with adequate training, supervision, and safe working conditions.

Airport emergency planning in Canada has been shaped by self-regulation, supported by the 2011 Canadian Airports Council (CAC) ARFF report, which was explicitly drafted to persuade Transport Canada to allow cost-saving deregulation. The report promoted a strategy of reducing ARFF services under the premise that savings would be redirected into general airport safety premises never meaningfully validated.

This policy shift, despite Motion 96's call for alignment with international standards, has left smaller airports like Deer Lake dangerously under-resourced. The TSB's final report must address not only whether lives could have been saved, but whether systemic gaps in emergency preparedness contributed to this tragedy.

Sincerely,



George Power
Vice Chair
Advocates for Safer Airports in Canada
St. John's, NL
Email: powergjf@gmail.com
Tel: (709) 727-7451